

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**SAINT LAWRENCE COMMUNICATIONS,
LLC,**

Plaintiff,

V.

**AMAZON.COM, INC. AND
AMAZON.COM LLC,**

Defendants.

Civil Action No. 2:19-cv-00027-JRG

**DECLARATION OF HEIDI L. KEEFE IN SUPPORT OF JOINT EMERGENCY
MOTION FOR 30-DAY CONTINUANCE IN VIEW OF COVID-19 VIRUS IMPACT**

I, Heidi L. Keefe, hereby declare:

1. I am a partner with Cooley LLP, counsel of record for the Amazon defendants in the above-captioned action. The statements made herein are based upon my personal knowledge, including knowledge gained through working with Amazon in this matter, unless otherwise specified herein.

2. Attached hereto as Exhibit 1 is a true and correct copy of a printout from a KIRO7.com webpage dated March 9, 2020.

3. Attached hereto as Exhibit 2 is a true and correct copy of a printout from a King County government webpage, dated March 7, 2020 and accessed on March 9, 2020.

4. Attached hereto as Exhibit 3 is a true and correct copy of a printout from a Business Insider webpage dated March 5, 2020 and accessed on March 9, 2020.

5. Attached hereto as Exhibit 4 is a true and correct copy of a printout from a Reuters webpage dated February 28, 2020 and accessed on March 9, 2020.

6. Attached hereto as Exhibit 5 is a true and correct copy of printouts from the Center for Disease Control website accessed on March 9, 2020.

7. Attached hereto as Exhibit 6 is a true and correct copy of a General Order issued by the United States District Court for the Western District of Washington on March 6, 2020.

8. Four Amazon employees who work in Amazon's downtown Seattle offices are relevant witnesses subject to upcoming depositions in this case. At least three of them will be designated by Amazon as Rule 30(b)(6) corporate witnesses on topics relevant to the parties' damages-related claims and defenses that will be addressed in the parties' damages-related expert reports. Those four individuals are all subject to Amazon's directives to work from home at least for the remainder of March 2020 and to avoid non-essential travel. In addition, as learned from counsel for plaintiff in this action, one individual witness on behalf of the plaintiff who is potentially relevant to damages-related issues in this case is also located in the Seattle area and subject to deposition prior to the close of fact discovery.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 9th day of March, 2020 in Palo Alto, California.

/s/ Heidi L. Keefe
Heidi L. Keefe